

EXHIBIT 10



Deposition of:

Kara Corrado

September 10, 2019

In the Matter of:

**Russell, Monique Vs. Educational
Commission For Foreign Medical
Graduates**

Veritext Legal Solutions

Exhibit 4

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1 investigations and referrals to the committee?

2 MS. McENROE: Objection to form.

3 THE WITNESS: Those procedures
4 are the procedures we follow, and have
5 followed, for quite some time in
6 reviewing the investigations of an
7 irregular behavior and referring matters
8 to the committee.

9 BY MR. THRONSON:

10 Q. Are you aware of any other
11 irregular -- procedures that apply to how to
12 conduct irregular behavior investigations or
13 when to refer matters to a committee that have
14 applied from 1996 to the present, besides the
15 policy labeled "draft policy" that you just
16 mentioned?

17 A. Not that I'm aware of.

18 Q. How long has the policy that you
19 mentioned been in effect?

20 A. The document I mentioned is, and
21 I might be splitting hairs, but it's
22 procedures.

23 So we have an irregular behavior
24 policy that governs the process that we publish

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1 on our website and that is given to
2 individuals.

3 The document that I'm referring
4 to that says "draft" is the procedures that
5 staff had been doing probably -- was probably
6 drafted around 2015 time frame, was put to
7 paper in 2015.

8 Q. Did any procedure exist before
9 that time that applied to how the organization
10 should conduct irregular behavior
11 investigations and when the staff should refer
12 matters to the creds committee?

13 A. Yes, those procedures that were
14 documented in 2015 were the procedures that
15 staff had been using at least since I started
16 working directly on cases of irregular
17 behavior, which is 2008 onward, and my
18 understanding would be prior to that as well.
19 I just wasn't working on those cases then.

20 Q. So is it fair to say that up
21 until 2015, those procedures were a custom of
22 the organization in terms of how to conduct
23 investigations and when to refer matters to the
24 committee and then they were written down in

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1 2015 in the document that we've been talking
2 about?

3 MS. McENROE: Objection to form.

4 THE WITNESS: So I don't know if
5 I would characterize them as a custom,
6 but they were documented together in
7 2015.

8 But when I started working on
9 irregular behavior cases those procedures
10 were -- I was trained on those procedures
11 and how to conduct the case.

12 BY MR. THRONSON:

13 Q. Was there a written policy --
14 sorry, written procedure that predated the 2015
15 procedure?

16 MS. McENROE: Objection to form.

17 THE WITNESS: Not that I can
18 recall.

19 BY MR. THRONSON:

20 Q. So as part of your training in
21 how to conduct irregular behavior
22 investigations prior to 2015, you weren't
23 trained on a particular written procedure; fair
24 to say?